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July 8, 1992

VIA FAX

Cheryl W. Smith
Senior Remedial Project Manager
United States Environmental Protection Agency
345 Courtland Street Northeast
Atlanta, Georgia 30365

Re: Response to EPA Comments of June 15, 1992
Revised Remedial Action Objectives Technical Memo
Olin Chemicals/McIntosh Plant Site
McIntosh, Alabama

Dear Ms. Smith:

As requested in your letter of June 15, 1992, attached are Olin's line-by-line responses to each of your comments on the subject document. We have repeated your comment with our response immediately below.

Please let me know if you have any questions regarding this submission or work in progress at McIntosh, Alabama.

Sincerely,

OLIN CORPORATION

J. C. Brown
Manager, Environmental Technology

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Enclosure

cc: W. A. Beal
D. E. Cooper (2)
W. J. Derocher
M. L. Fries

W. G. McGlasson
J. L. McIntosh
T. B. Odom
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**Olin Corporation Response to EPA's
Technical Review Comments on the
REVISED REMEDIAL ACTIONS OBJECTIVES
TECHNICAL MEMORANDUM
EPA Letter of June 15, 1992
Olin Corp. Superfund Site
McIntosh, Alabama**

GENERAL COMMENTS

The document included adequate indication that you are on target with development of remedial action objectives that are protective of human health and the environment. Specifically, enough general information was presented as specified in applicable EPA guidance (Guidance for Conducting Remedial Investigations and Feasibility Studies under CERCLA, Section 4.2.11, OSWER Directive 9355.3-01, October 1988). However, future sampling efforts will require reconsideration of the following:

- The contaminants of concern
- Exposure routes and receptors
- An acceptable contaminant level or range of levels for each exposure route (i.e., preliminary remediation goals)

Response: We interpret this comment to be a general statement that plans for future sampling efforts should be sensitive to the objectives listed in the comment. We certainly agree. We do not interpret that EPA is requesting any specific sampling effort above that currently planned in Phase III at this time.

SPECIFIC COMMENTS

1. Page 8, Paragraph 4. Since EPA has recommended additional soil sampling that may produce air/dust emissions, additional sampling of air emissions may be required and included as a potentially affected media.

Response: We are somewhat unclear as to the meaning of this comment. If you meant that the results of the additional soil sampling could discover concentrations of compounds that may adsorb to dust or volatilize and that such concentrations may lead to a need to sample air emissions, we agree.

2. Page 9, Paragraph 1. All contaminants present on site must be addressed regardless of their origin (i.e., pesticides in basin).

Response: All contaminants present on-site, including pesticides in the basin, are being addressed through the baseline risk assessment process.

3. Page 10, Paragraph 1. Remove the following sentence from future submittals: "Alpha BHC is not considered an Olin constituent." Pesticides detected on site should not be excluded as contaminants of concern because the source is from a source other-than-Olin. The baseline risk assessment is to determine the total environmental risks to a person at the site and therefore should include all contaminants regardless of the source.

Response: As noted above, all contaminants are being addressed through the baseline risk assessment process. We do not believe you meant to say that Olin is responsible for contamination from sources other than Olin. As to the sentence referred to, we do not understand your wish to have it removed. Olin is not implying that alpha-BHC will not be addressed. The sentence is factual since Olin has never manufactured or used alpha-BHC at the site.

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July 8, 1992